

IN THE UNITED STATES PATENT AND TRADE-MARK OFFICE

In re Application of

CORBIN COYES and BEN ROWLANDSON

Serial No. 10/624,235

Filed: July 21, 2003

For: VALVE CAGE INSERT

AFFIDAVIT

The undersigned, Corbin Coyes, being duly sworn, deposes and says that he is a citizen of Canada, residing at 4671 Quentin Street S.W., Calgary, Alberta, Canada, T2T 6J1:

(1) That I, the undersigned, Corbin Coyes, participated in developing an insert that would fit into the shell of a ball valve for use in a conventional reciprocating downhole pump;

(2) That, in cooperation with my associate, Ben Rowlandson, we designed and constructed a laboratory scale apparatus that would test the efficiency of fluid flow through such inserts;

(3) That we then designed and constructed various forms of insert, involving in the order of five different plastic prototypes, and tested these prototypes in the test apparatus, in the course of which the insert described and claimed in the present application evolved;

(4) That three individuals, Ben Rowlandson, Murray Broadbend and myself, then incorporated a company (979842 Alberta Corporation) to undertake the manufacture, marketing and sale of the claimed insert;

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(5) That these three aforementioned individuals all have full time jobs and young families and have been able to devote only their spare time to the undertaking;

(6) That initially an insert, as claimed, was tested in a pump in a shallow oil well to test its flow characteristics and structural durability – the pump functioned well – after six months the pump was recovered from the well and the insert was then inspected and found to be in 'as new' condition;

(7) That since that initial test, similar inserts have been successfully used in the pumps of thirty wells operated by eight different oil companies, under a variety of temperature, pressure, well fluid composition, depth and H₂S conditions;

(8) That the companies which have used the inserts have done so primarily on the basis of word of mouth referrals and reputation of the insert – there has been no commercial advertising of the product; and

(9) That 979842 Alberta Corporation has now recently arranged for the manufacture of 1000 inserts by a third party fabricator – about fifty of these inserts have been supplied to two pump shops for re-sale – and a major distributor of downhole pumps has been testing the claimed insert for about six months with a view to determining whether to market the insert.

Further Affiant sayeth not.


CORBIN COYES

Executed on April 5th, 2005, before Shane Saunders

a Notary Public in and for the province of Alberta.

